

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FORTIS CORPORATE INSURANCE, N.V.,

Plaintiff,

- against -

UNITED VAN LINES, LLC,

Defendant.

Civil Action No. 07 Civ. 4050 (RWS)(DCF)

**NOTICE OF MOTION TO
COMPEL DISCOVERY**

UNITED VAN LINES, LLC,

Third-Party Plaintiff,

- against -

TRW TRUCKING, LLC n/k/a SPORTS
ASSOCIATED, INC., and SPORTS
ASSOCIATED, INC.

Third-Party Defendants.

SIRS:

PLEASE TAKE NOTICE that the undersigned counsel for defendant and third-party plaintiff, UNITED VAN LINES, LLC (“UNITED”) will move before Hon. Robert W. Sweet, U.S.D.J., at the United States District Court, Southern District of New York at the U.S. Courthouse, Room 1920, 500 Pearl Street, New York, New York 10007 on Wednesday, January 16, 2008 at 12:00 noon, or soon after as counsel may be heard for a Order pursuant to Fed.R.Civ.P. 37 compelling plaintiff to comply with UNITED’s discovery requests as follows:

- (a) serve complete verified responses to Defendant's First Set of Interrogatories, dated July 6, 2007;

- (b) serve complete responses to Defendants' First Document Request, dated July 6, 2007;
- (c) serve complete responses to Defendants' Second Document Request, dated November 13, 2007;
- (d) produce the goods that are the subject of this action for inspection on January 25, 2008;
- (e) produce for depositions designated Rule 30(b)(6) representatives of plaintiff and its subrogor pursuant to UNITED's Notice of Deposition, dated, December 12, 2007, and
- (f) pay UNITED's attorney's fees and costs incurred in making the instant motion, and

PLEASE TAKE FURTHER NOTICE that in support of this motion defendant shall rely upon the annexed Supporting Affidavit of George W. Wright, sworn to on January 8, 2008, and Memorandum of Law; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: New York, New York
January 8, 2008

GEORGE W. WRIGHT & ASSOCIATES, LLC

By: George W. Wright
George W. Wright
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DORIS SORAN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 3, 2011